

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
DIVISION

Americans with Disabilities Act of 1990, as amended, 42 U.S.C. §§ 12101, *et seq.*, for employment discrimination on the basis of disability.  
**NOTE:** *In order to bring suit in federal district court under the Americans with Disabilities Act, you must first obtain a right-to-sue letter from the Equal Employment Opportunity Commission.*

\_\_\_\_ Rehabilitation Act of 1973, as amended, 29 U.S.C. §§ 701, *et seq.*, for employment discrimination on the basis of a disability by an employer which constitutes a program or activity receiving federal financial assistance.

NOTE: *In order to bring suit in federal district court under the Rehabilitation Act of 1973, you must first file charges with the appropriate Equal Employment Office representative or agency.*

\_\_\_\_ Other (Describe)

PARTIES

2. Plaintiff's name: Joe Bryant Hudson

Plaintiff's address: 4244 Satiris drive

Street address or P.O. Box

Florissant Missouri 63033

City/ County/ State/Zip Code

(314) 532-5876

Area code and telephone number

3. Defendant's name: Square Inc.

Defendant's address: 1455 Market Street

Street address or P.O. Box

San Francisco California, CA 94103

City/County/State/ Zip Code

N/A

Area code and telephone number

NOTE: IF THERE ARE ADDITIONAL PLAINTIFFS OR DEFENDANTS, PLEASE PROVIDE THEIR NAMES, ADDRESSES AND TELEPHONE NUMBERS ON A SEPARATE SHEET OF PAPER.

4. If you are claiming that the discriminatory conduct occurred at a different location, please provide the following information:

4320 Forest Park Avenue Saint Louis Missouri 63108  
(Street Address) (City/County) (State) (Zip Code)

5. When did the discrimination occur? Please give the date or time period:

August - September 2019

#### ADMINISTRATIVE PROCEDURES

6. Did you file a charge of discrimination against the defendant(s) with the Missouri Commission on Human Rights?

☒ Yes Date filed: 3/30/2020

☐ No

7. Did you file a charge of discrimination against the defendant(s) with the Equal Employment Opportunity Commission or other federal agency?

☒ Yes Date filed: 3/30/2020

☐ No

8. Have you received a Notice of Right-to-Sue Letter?

☒ Yes

☐ No

If yes, please attach a copy of the letter to this complaint.

9. If you are claiming age discrimination, check one of the following:

☐ 60 days or more have passed since I filed my charge of age discrimination with the Equal Employment Opportunity Commission.

☒ fewer than 60 days have passed since I filed my charge of age discrimination with the Equal Employment Opportunity Commission.

NATURE OF THE CASE

10. The conduct complained of in this lawsuit involves (check only those that apply):
- ☐ failure to hire me
  - ☒ termination of my employment
  - ☐ failure to promote me
  - ☐ failure to accommodate my disability
  - ☐ terms and conditions of my employment differ from those of similar employees
  - ☐ retaliation
  - ☐ harassment
  - ☐ other conduct (specify):

Did you complain about this same conduct in your charge of discrimination?

☒ Yes

☐ No

11. I believe that I was discriminated against because of my (check all that apply):

☒ race

☒ religion

☐ national origin

☐ color

☐ gender

☐ disability

☐ age (birth year is: \_\_\_\_\_)

☐ other:

Did you state the same reason(s) in your charge of discrimination?

☒ Yes

☐ No

12. State here, as briefly and clearly as possible, the essential facts of your claim. Describe specifically the conduct that you believe is discriminatory and describe how each defendant is involved in the conduct. Take time to organize your statement; you may use numbered paragraphs if you find it helpful. It is not necessary to make legal arguments, or to cite cases or statutes.

Typed on pg. 6

(Continue to page 6, if additional space is needed.)

My name is JeBryant Hudson and I am a former employee of Square Inc. I was employed with Square from October 2018 until I was discharged around September 11th 2019. My most recent position was Customer Support Advocate and my most recent supervisor was Brianna Little.

In or around September 2019, I made a public religious post on my social media page (facebook) and shortly thereafter, I was terminated. The activities on my facebook page include black community upliftment and inner city security. The organization that I was apart of was the *Nation of Islam* and I identify as a *Black Muslim*. Our values are based on *freedom, justice, and equality*.

On September 10th Human Resources April Powell said that I violated a company policy, but she could not tell me what policy I violated. April stated that she watched me for 2 months breaking policy. Before my termination I would have weekly 1-on-1's with my supervisor and no such violations were mentioned. Before I left, April teared up and I was escorted out by security.

Usually April & I were very cordial, however I noticed her distancing herself and avoiding me in interactions. Also, My supervisor began to push back 1-on-1's frequently, and her reasoning was that she was "too busy" therefore she would have to reschedule.

Also, the CEO Jack Dorsey came to St. Louis to talk to our office for a company meeting. I was unable to attend because I was made to work along with a few others while the rest of the company attended the meeting.

I believe that I have been discriminated against because of my religion in that I was discharged for being in the *Nation Of Islam being a Black Muslim*. This violated my **civil rights under Title VII of the civil Rights act of 1964, as amended.**

13. The acts set forth in paragraph 12 of this complaint:

☐ are still being committed by the defendant.

☐ are no longer being committed by the defendant.

☒ may still be being committed by the defendant.

**REQUEST FOR RELIEF**

State briefly and exactly what you want the Court to do for you. Make no legal arguments;

cite no cases or statutes. Printed on next pg. n.5

14. Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule

How I would like the court to help is the recoupment of damages totaling **\$3,000,000** for:

1. Missed wages due to termination- \$750,000
2. Employment gaps-\$750,000
3. Employment reputation being tarnished-\$750,000
4. Emotional Distress-\$750,000



I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 16<sup>th</sup> day of September, 2020.

Signature of Plaintiff 